

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RANDY DAVIES ANDERSON,

Defendant.

) INDICTMENT CR 11-343JNE/SER  
)  
) (18 U.S.C. § 2251(a))  
) (18 U.S.C. § 2251(e))  
) (18 U.S.C. § 2253(a))  
)  
)  
)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

In or about January 2011, in the State and District of Minnesota, the defendant,

**RANDY DAVIES ANDERSON,**

did knowingly employ, use, persuade, induce, entice, and coerce Jane Doe #1, a minor child, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, including but not limited to the following computer image files: "DSCN0500.JPG," "DSCN0501.JPG," "DSCN0502.JPG," "DSCN0503.JPG," and "DSCN0504.JPG," in violation of Title 18, United States Code, Sections 2251(a) and (e).

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby re-alleged and incorporated as if fully set forth herein by reference, for the

SCANNED

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U.S. DISTRICT COURT ST. PAUL

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FILED  
RICHARD D. SLETTEN, CLERK  
JUDGMENT ENTD. \_\_\_\_\_  
DEPUTY CLERK \_\_\_\_\_

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purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to the following items:

1. Pink Nikon Coolpix S230 camera, SN:36227234;
2. Sony Handycam Vision CCD-TRV68, SN:741953;
3. HP iPAQ HSTNH-H06C, SN:TWCC616083G;
4. 10 USB thumb drives, 3 external USB hard drives and 1 256MB SD card;
5. Red Nokia 5610d-2b cell phone with charger;
6. Lenovo Thinkpad T410, SN:252223U, with charger;
7. Toshiba Satellite 1735 SN:2135203CU-1;

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8. Western Digital Caviar SE SATA hard drive,  
SN:WMAMD1580304;
9. Various CDs and DVDs.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON